IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TABATHA WERKMEISTER, et al)
Plaintiffs,) C. A. No. 15-01069
V.)
CITY OF PITTSBURGH, et al)))
Defendants.) JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND MOTION FOR SUMMARY JUDGMENT RESPONSE DEADLINES

And NOW come the parties by and through their undersigned counsel to allege and move this Court as follows:

- 1. By order of court dated February 28, 2018 this Honorable Court extended the deadlines related to motions for summary judgment by 14 days, thereby setting a deadline of April 16, 2018 for the parties to submit responses to motions for summary judgment. ECF # 129.
- 2. The Parties have conferred and have concluded that they will each require an additional 7 days in which to prepare their respective responses.
- 3. As such, the parties request that this Honorable Court extend the deadline for filing responses to motions for summary judgment by 7 days, or until April 23, 2018. The Parties also request that other deadlines set forth in this Court's January 11, 2000 Order (ECF # 124) and extended by the Court's February 28, 2018 Order (ECF # 129) be similarly extended.
- 4. No party will be prejudiced by the granting of the relief requested herein and the granting of this relief will not unduly delay the proceedings in this case.

WHEREFORE, the Parties jointly request that the filing deadlines set forth in this Court's January 11, 2018 Order extended by 7 days.

Respectfully submitted,

Dated: April 13, 2018

/s/ Margaret S. Coleman
Margaret S. Coleman, Esquire
PA I. D. #200975
Law Office of Timothy P. O'Brien
2103 Investment Building
239 Fourth Avenue
Pittsburgh, PA 15222
(412) 232-4400

Attorney for Plaintiff

/s/ Matthew S. McHale Matthew S. McHale, Esquire Pa. I.D. #91880

City of Pittsburgh Department of Law 313 City-County Building 414 Grant Street Pittsburgh, PA 15219 Telephone: (412) 255-2002

Counsel for Counsel for Defendants Tersak, Coleman, Engelhardt, Yosi, Garris, Hartung, Hall, Blahut, Geyser and O'Brien: